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**FILED**

NOV 20 2015  
Clerk, U S District Court  
District Of Montana  
Billings 

**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

<b>UNITED STATES OF AMERICA,</b>	<b>CR 15-139-BLG-SPW</b>
<b>Plaintiff,</b>	<b>INDICTMENT</b>
<b>vs.</b>	<b>CONSPIRACY TO DISTRIBUTE EXPLOSIVES WITHOUT A LICENSE Title 18 U.S.C. § 844(n) (Count I) (Penalty: Ten years imprisonment, \$250,000 fine, and three years supervised release)</b>
<b>NATHEN JEROME ADAMS, and HEATHER LYNN STOUT,</b>	<b>DISTRIBUTION OF EXPLOSIVES WITHOUT A LICENSE (Count II) Title 18 U.S.C. § 842(a)(3)(B) (Penalty: Ten years imprisonment, \$250,000 fine, and three years supervised release)</b>
<b>Defendants.</b>	<b>POSSESSION OF STOLEN EXPLOSIVES (Count III) Title 18 U.S.C. § 842(h) (Penalty: Ten years imprisonment, \$250,000 fine, and three years supervised release)</b>

	<b>POSSESSION OF EXPLOSIVES BY A PROHIBITED PERSON (Count IV)</b> <b>Title 18 U.S.C. § 842(i)</b> <b>(Penalty: Ten years imprisonment, \$250,000 fine, and three years supervised release)</b>
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THE GRAND JURY CHARGES:

COUNT I

That beginning in approximately October 31, 2015, and continuing until on or about November 4, 2015, at Billings, and other locations in the State and District of Montana and elsewhere, the defendants, NATHEN JEROME ADAMS and HEATHER LYNN STOUT, knowingly and unlawfully conspired and agreed with one another and other persons, known and unknown to the Grand Jury, to distribute explosives without a license, in violation of 18 U.S.C. § 843(a)(3)(B), to wit: a 16-inch stick of Geldyne semi-gelatin dynamite (date shift code 23 MA94J1), in violation of 18 U.S.C. § 844(n).

COUNT II

That on or about November 4, 2015, at Billings, in the State and District of Montana, the defendant, NATHEN JEROME ADAMS, not being a licensee under the provisions of Chapter 40 of Title 18 of the United States Code, knowingly distributed explosive materials, to wit: a 16-inch stick of Geldyne semi-gelatin dynamite (date shift code 23 MA94J1), to a person who was not a licensee under the

provisions of Chapter 40 of Title 18 of the United States Code, in violation of 18 U.S.C. § 842(a)(3)(B) and 844(a).

COUNT III

That on or about November 4, 2015, at Billings, in the State and District of Montana, the defendant, NATHEN JEROME ADAMS knowingly possessed, in and affecting interstate commerce, stolen explosive materials, to wit: a 16-inch stick of Geldyne semi-gelatin dynamite (date shift code 23 MA94J1), having reasonable cause to believe the explosive materials were stolen, in violation of 18 U.S.C. § 842(h) and 844(a).

COUNT IV

That on or about November 4, 2015, at Billings, in the State and District of Montana, the defendant, NATHEN JEROME ADAMS, having been convicted of a crime punishable by a term of imprisonment for a term exceeding one year under the laws of the State of Arizona, knowingly and unlawfully possessed, in and affecting interstate commerce, explosive materials, to wit: a 16-inch stick of Geldyne semi-gelatin dynamite (date shift code 23 MA94J1), in violation of 18 U.S.C. § 842(i) and 844(a).

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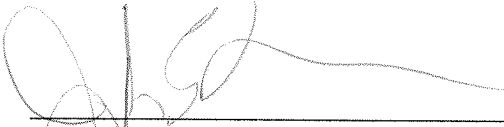
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A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.



MICHAEL W. COTTER  
United States Attorney



JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney

Crim. Summons

Warrant:

✓ - both

Bail: